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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

NOV 19 2019

SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON DEPUTY

7 UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 RUSSELL PAUL NICKERSON,

13 Defendant.

2:19-CR-191-RMP

INDICTMENT

Vio: 18 U.S.C. § 472  
Possession of Counterfeit  
Currency (Count 1)

18 U.S.C. § 472  
Passing Counterfeit Currency  
(Count 2)

18 U.S.C. §§ 982(a)(2)(B), 492,  
28 U.S.C. § 2461(c)  
Notice of Criminal Forfeiture

21 The Grand Jury charges:

22 COUNT 1

23 On or about October 3, 2019, in the Eastern District of Washington, the  
24 Defendant, RUSSELL PAUL NICKERSON, did, with the intent to defraud,  
25 possess falsely made, forged, and counterfeit Federal Reserve Notes, to wit:  
26 eighteen (18) counterfeit \$50 Federal Reserve Notes, bearing serial number  
27

28

INDICTMENT - 1

1 MG14318339B, totaling \$900.00 face value; and ten (10) \$20 counterfeit Federal  
2 Reserve Notes, bearing serial number MB40946896F, totaling \$200.00 face value,  
3 which RUSSELL PAUL NICKERSON knew to be falsely made, forged, and  
4 counterfeit, all in violation of 18 U.S.C. § 472.  
5  
6

7 COUNT 2  
8

9 On or about December 5, 2017, in the Eastern District of Washington, the  
10 Defendant, RUSSELL PAUL NICKERSON, did, with the intent to defraud, pass  
11 eight (8) falsely made, forged, and counterfeit \$50 Federal Reserve Notes, bearing  
12 serial number MF09682731A, which RUSSELL PAUL NICKERSON knew to be  
13 falsely made, forged, and counterfeit, to Aces Casino at 6301 N. Division Street,  
14 Spokane, Washington, all in violation of 18 U.S.C. § 472.  
15  
16

17 NOTICE OF CRIMINAL FORFEITURE  
18

19 The violations alleged in this Indictment are hereby re-alleged and  
20 incorporated herein by reference for the purpose of alleging forfeitures.  
21

22 Pursuant to 18 U.S.C. § 982(a)(2)(B) upon conviction of an offense(s) in  
23 violation of 18 U.S.C. § 472, as charged in this Indictment, the Defendant,  
24 RUSSELL PAUL NICKERSON, shall forfeit to the United States of America, any  
25 property constituting, or derived from, any proceeds obtained, directly or  
26 indirectly, as the result of such violation.  
27

28 Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c), upon conviction of an  
offense(s) in violation of 18 U.S.C. § 472, as charged in this Indictment, the  
Defendant, RUSSELL PAUL NICKERSON, shall forfeit to the United States of  
America, all counterfeits of any coins or obligations or other securities of the

1 United States or of any foreign government; any articles, devices, and other things  
2 made, possessed, or used in violation of 18 U.S.C. §§ 471, 472; and, any material  
3 or apparatus used or fitted, or intended to be used, in the making of such  
4 counterfeits, articles, devices, or things, found in the possession of the Defendants  
5 without proper authority.

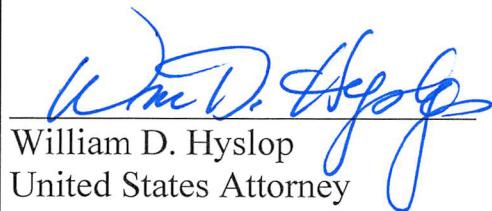
6 If any forfeitable property, as a result of any act or omission of the  
7 Defendant(s):

- 8 a. cannot be located upon the exercise of due diligence;
- 9 b. has been transferred or sold to, or deposited with, a third party;
- 10 c. has been placed beyond the jurisdiction of the court;
- 11 d. has been substantially diminished in value; or
- 12 e. has been commingled with other property which cannot be divided  
13 without difficulty,

14 the United States of America shall be entitled to forfeiture of substitute property  
15 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) or 28  
16 U.S.C. § 2461(c).

17 DATED this 19 day of November, 2019.

18 A TRUE BILL

22   
23 William D. Hyslop  
24 United States Attorney

26   
27 Earl A. Hicks  
28 Assistant United States Attorney